



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329  
(916) 322-5660 • Fax (916) 322-0886

November 4, 2010

Mr. William Barahona

Redacted

RE: FPPC File No. 10/940; Paul Leon

Dear Mr. Barahona:

This letter is to notify you that the Enforcement Division of the Fair Political Practices Commission (the "Commission") will investigate the allegation(s), under the jurisdiction of the Commission, of the sworn complaint you submitted in the above-referenced matter. You will next receive notification from us upon final disposition of the case. However, please be advised that at this time we have not made any determination about the validity of the allegation(s) you have made or about the culpability, if any, of the person(s) you identify in your complaint.

Thank you for taking the time to bring this matter to our attention.

Sincerely,

Roman G. Porter  
Executive Director

RGP/jt  
cc: Mr. Paul Leon

## SWORN COMPLAINT FORM

(Form May Be Subject to Public Disclosure)\*

RECEIVED  
FAIR POLITICAL  
PRACTICES COMMISSION

10 OCT 25 PM 2:23

AS REQUIRED BY GOVERNMENT CODE SECTION 83115, please complete the form below to file a sworn complaint with the Fair Political Practices Commission. **This form must be completed in its entirety and all pertinent information must be stated on this form, not as an attachment.** Attachment is SIGNED UNDER PENALTY OF PERJURY.

Mail the complaint to: **Enforcement Division  
Fair Political Practices Commission  
428 J Street, Suite 620  
Sacramento, California 95814**

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### Person Making Complaint

Last name: BARAHONA

First Name: WILLIAM

Street Address: Redacted

City: \_\_\_\_\_ State: \_\_\_\_\_

Zip: \_\_\_\_\_

Telephone: ( \_\_\_\_\_ ) \_\_\_\_\_

Fax: ( NONE ) \_\_\_\_\_

E-mail: \_\_\_\_\_

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### **\*IMPORTANT NOTICE**

Under the California Public Records Act (Gov. Code Section 6250 and following), this sworn complaint and your identity as the complainant may be subject to public disclosure. Unless the Chief of Enforcement deems otherwise, within three business days of receiving your sworn complaint we will send a copy of it to the persons(s) you allege violated the law.

In some circumstances, the FPPC may claim your identity is confidential, and therefore not subject to disclosure. A court of law could ultimately make the determination of confidentiality. If you wish the FPPC to consider your identity confidential, do not file the complaint before you contact the FPPC (916-322-5660 or toll free at 866-ASK-FPPC) and discuss the complaint with an Enforcement Division attorney.

**Complaint**

**Person or Persons who Allegedly Violated the Political Reform Act:** (If there are multiple parties involved, attach additional pages as necessary.)

Last Name: LEON

First Name: PAUL

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_

Zip: \_\_\_\_\_

Telephone: (\_\_\_\_) \_\_\_\_\_

Fax: (\_\_\_\_) \_\_\_\_\_

E-mail: UNKNOWN

**Provision or Provisions of the Political Reform Act Allegedly Violated:** (If specific sections are not known, please provide a brief summary of the nature of the violation(s), and when it (they) occurred.) **You must state the suspected violation(s) on this form.**

SEE ATTACHMENT LABELED AS EXHIBIT "1" AND

INCORPORATED HEREIN BY REFERENCE

ATTACHMENT SIGNED UNDER PENALTY OF PERJURY.

**Description, With as Much Particularity as Possible, of Facts Constituting Alleged Violation and how you have personal knowledge that it occurred\*\***

SEE ATTACHMENT LABELED AS EXHIBIT "1" AND  
INCORPORATED HEREIN BY REFERENCE

ATTACHMENT SIGNED UNDER PENALTY OF PERJURY

**\*\*Please attach copies of any available documentation that is evidence of the violation, (for example, checks, campaign materials, etc., if applicable to the complaint). Note that a newspaper article is NOT considered evidence of a violation.**

**Name and Addresses of Potential Witnesses, in addition to yourself, if Known:**

Last Name: CHAVEZ

First Name: ESTEBAN

Street Address:  
Redacted

City: State:

Zip:

Telephone: ( ) -

Fax: ( ) -

E-mail: UNKNOWN

(Please print your name)

**Provisions or Provisions of the Political Reform Act Allegedly Violated and Description with as much particularit as Possible, of facts constituting alleged violation and how ou have personal knowledge that it occurred :**

September 28, 2006:

Mr. Paul Leon requested a check from me for a survey he was conducting for political reasons. He asked that I make the check payable to DCR Consulting 979 in the sum of \$3,500.00. Said funds were used for his own personal benefit. This company did not exist and the check does not appear in his report. A copy of the check is attached hereto as Exhibit "A" and incorporated herein by reference.

October 31, 2006:

Mr. Paul Leon went to my office requesting \$5,000 for his campaign. While in the process of issuing Mr. Leon my company check he stopped me and advised me that he would prefer cash. I then asked one of my employee, Esteban Chavez, to go to my bank at Bank of America and cash a check for me in the sum of \$6,000.00 so that I could give Mr. Paul Leon \$5,000.00 and so that I would have some cash on me in the sum of \$1,000.00.

In Mr. Paul Leon's own vehicle followed my employee Esteban Chavez, in his own vehicle to Bank of America where Mr. Chavez cashed my check for \$6,000.00. Mr. Chavez then personally handed Mr. Leon \$5,000.00 cash. Mr. Leon never gave my employee, Esteban Chavez a receipt for same. Mr. Chavez then returned with the additional \$1,000.00 and handed it to me.

I have repeatedly asked for a receipt from Mr. Paul Leno but as to today's date he has not given me one. A copy of my check number 1003 payable to Esteban Chavez in the sum of \$6,000.00 dated October 31, 2006, is attached hereto as Exhibit "B" and incorporated herein by reference.

2007:

A birthday party was conducted for Mr. Paul Leon. Said birthday party had to cost at least \$300,000.00. The funds were never reported. Copies of the birthday parties is attached hereto as Exhibit "C" and incorporated herein by reference.

2007:

Mr. Frank De Leon gifted Mr. Paul Leon an air-conditioner in the summer of 2007 valued at approximately \$3,500.00. It was never reported or documented.

2008:

Mr. Paul Leon's gross earnings are \$50,000.00 per year but he is living the lavished life style of a millionaire, for example, parties, taking trips to Hawaii, etc. A copy of his party is illustrated in Exhibit "C" and a picture of his trip to Hawaii is attached hereto as Exhibit "D" and incorporated herein by reference.

2010:

SolarCity is a company conducting business with the City of Ontario and Mr. Paul Leon, Jr. He is the consultant and representing SolarCity. This is a conflict of interest. A copy of said company's owner, Paul Leon, Jr. is attached hereto as Exhibit "E" and incorporated herein by reference.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: 10-15-10

Redacted

WILLIAM BARAHONA